

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WILLOW FRIEDLAND, STEVEN GONZALEZ,
and MIRIAM SIERADZKI,

Plaintiffs,

-against-

CITY OF NEW YORK, FORMER MAYOR BILL DE BLASIO; FORMER NEW YORK CITY POLICE DEPARTMENT COMMISSIONER DERMOT SHEA; and FORMER NEW YORK CITY POLICE DEPARTMENT CHIEF OF DEPARTMENT TERENCE MONAHAN,

DECLARATION OF YINI ZHANG IN SUPPORT OF DEFENDANTS' RENEWED MOTION TO DISMISS THE SECOND AMENDED COMPLAINT PURSUANT TO RULE 12(B)(6)

24-CV-07064 (DLC)

Defendants.

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YINI ZHANG, an attorney duly admitted to practice in the United States District Court for the Southern District of New York, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. I am the attorney assigned to the defense of this action. As such, I am familiar with the facts and circumstances stated herein.

2. I submit this declaration in support of Defendants' Motion to Dismiss the Second Amended Complaint Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. In support of their motion, defendants submit the exhibits describe below.

3. Annexed hereto as **Exhibit "A"** is a true and correct copy of the New York City Police Department Summons Number 4440045614 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Willow Friedland, previously known as Ilan Friedland, in connection with the arrest in question.

4. Annexed hereto as **Exhibit “B”** is a true and correct copy of the New York City Police Department Summons Number 4440045600 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Steven Gonzalez in connection with the arrest in question.

5. Annexed hereto as **Exhibit “C”** is a true and correct copy of the New York City Police Department Summons Number 4440045629 for Incident Date June 2, 2020 at 12:00 a.m. issued to plaintiff Miriam Sieradzki in connection with the arrest in question.

Dated: New York, New York
May 30, 2025

/s/ Yini Zhang
Yini Zhang
Senior Counsel